

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED

FILED

SEP 19 2019

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

FLOYD BARBER,
LARENTA JONES (a/k/a "Ammo"),
STEPHAN JONES (a/k/a "Scooby"), and
JERELL HENDERSON (a/k/a "Boogie"),

THIS IS A DEATH ELIGIBLE CASE

4:19CR00755 HEA/PLC

Defendants.

INDICTMENT

**COUNT 1
(Drug Conspiracy)**

The Grand Jury charges that:

On or about October 3, 2017, in the City of Saint Louis, within the Eastern District of Missouri,

**FLOYD BARBER,
LARENTA JONES (a/k/a "Ammo"),
STEPHAN JONES (a/k/a "Scooby"), and
JERELL HENDERSON (a/k/a "Boogie")**

the Defendants herein, did knowingly and intentionally conspire, combine, confederate and agree, with other persons both known and unknown to the federal grand jury, including, but not limited to, KURT WALLACE, to commit offenses against the United States, to wit: to knowingly and intentionally possess with the intent to distribute a controlled substance.

In violation of Title 21, United States Code, Section 846; and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT 2

(Conspiracy to Possess Firearms in Furtherance of Drug Trafficking)

The Grand Jury further charges that:

On or about October 3, 2017, in the City of Saint Louis, within the Eastern District of Missouri,

**FLOYD BARBER,
LARENTA JONES (a/k/a "Ammo"),
STEPHAN JONES (a/k/a "Scooby"), and
JERELL HENDERSON (a/k/a "Boogie")**

the Defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and others, including, but not limited to, KURT WALLACE, to possess one or more firearms in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846, as set forth in Count 1.

In violation of Title 18, United States Code, Section 924(o).

COUNT 3

(Murder of Ladareace Pool)

The Grand Jury further charges that:

On or about October 3, 2017, in the City of Saint Louis, within the Eastern District of Missouri,

**FLOYD BARBER,
LARENTA JONES (a/k/a "Ammo"),
STEPHAN JONES (a/k/a "Scooby"), and
JERELL HENDERSON (a/k/a "Boogie")**

the Defendants herein, aiding and abetting each other, acting together and with other persons both known and unknown to the federal grand jury, including, but not limited to, KURT WALLACE, knowingly possessed, brandished and discharged a firearm in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846, as set forth in Count 1.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A).

And in the course of this violation caused the death of LADAREACE POOL through the use of the firearm, which killing is murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, unlawfully killed LADAREACE POOL by shooting him with the firearm willfully, deliberately, maliciously, and with premeditation, thereby making this offense punishable under Title 18, United States Code, Section 924(j)(1).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

THOMAS REA, #53245MO
Assistant United States Attorney